

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:14-CR-306
)	
PEDRO ANTHONY ROMERO CRUZ, <i>et al.</i> ,)	The Honorable Gerald Bruce Lee
)	
Defendants.)	
)	

GOVERNMENT’S REQUEST FOR FURTHER CLARIFICATION OF COURT ORDER

The United States of America, by and through undersigned counsel, respectfully requests further clarification of the Court’s Order concerning the government’s recent disclosure of approximately 920 jail calls, Doc. No. 702.

The last line of the Court’s Order states: “Further, the Government must provide Defendants with transcripts of any calls involving Government witnesses it intends to call at trial.” *Id.* at 2. The government requests that the Court clarify whether this line relates only to the approximately 920 jail calls produced on February 16, 2016, or whether the Court is ordering the government to produce transcripts of all recordings of any testifying witness, including recordings that were produced in discovery over a year ago.

At trial, the government expects to call the Confidential Human Source (“CHS”) whose consensual wire produced over 7,000 calls. All of those calls would be implicated if the Court has ordered the government to produce transcripts of all recordings of any testifying witness. Accordingly, the government respectfully requests clarification of the Court’s Order.

Respectfully Submitted,

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/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd of March, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to counsel of record.

/s/

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